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10 IN THE UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
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13 CYNTHIA MAHON and GARY
MARKLEY,
14 Plaintiffs

CASE NO. 2:03-cv-1763 MCE DAD

15 vs.

STIPULATION TO EXTEND
DEADLINES; ORDER

16 CROWN EQUIPMENT CORPORATION,
dba CROWN LIFT TRUCKS, and DOES 1
17 through 50, inclusive,

18 Defendants.
19 _____/

20 IT IS HEREBY STIPULATED by and between the parties, through their respective
21 attorneys of record, in accordance with Local Rule 83-141, that the deadlines related to this
22 matter should be extended as described herein, for the following good cause:

23 1. The parties have recently opened up settlement discussions and request
24 additional time to evaluate this case and attempt a resolution.

25 2. An extension on deadlines set by this court is necessary in order to adequately
26 complete discovery, and assess the value of this case.

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1 3. This action involves many complex issues, and the parties have just recently
2 resolved a discovery dispute. The parties have made progress through
3 depositions and written discovery, yet additional time is needed to complete
4 discovery.

5 4. Plaintiff Cynthia Mahon is recovering from her third surgery following her
6 foot crush injury allegedly related to this action. The parties need additional time to evaluate Ms.
7 Mahon's condition.

8 5. The parties stipulate and propose that deadlines set by the Court should be
9 extended as follows:

- 10 1. Discovery to be completed no later than March 31, 2005.
- 11 2. Early Settlement Conference on May 11, 2006, at 10:00 a.m., before
12 Judge Drozd.
- 13 3. Expert witness disclosure no later than May 1, 2006.
- 14 4. All dispositive motions, except motions for continuances, temporary
15 restraining orders or other emergency applications shall be filed no later
16 than June 2, 2006.
- 17 5. Final Pre-trial Conference on August 7, 2006 at 01:30 p.m.
- 18 6. Trial to commence on September 13, 2006. Parties to produce all
19 exhibits to the Court no later than 3:00 p.m. on September 6, 2006.

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1 IT IS FURTHER STIPULATED that this Stipulation may be signed in counterparts and
2 that a signature by facsimile shall be deemed counsel's original signature.

3 Respectfully Submitted,
4 Dated: _____ KERSHAW, CUTTER & RATINOFF, LLP

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7 C. BROOKS CUTTER
8 KERRIE WEBB
Attorneys for Plaintiffs

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10 MATHENY, SEARS, LINKERT & LONG, LLP


11 Dated: _____
12 DOUGLAS A. SEARS
13 SEAN RICHMOND
Attorneys for Defendants

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15 **ORDER**

16 GOOD CAUSE APPEARING THEREFOR,

17 IT IS HEREBY ORDERED that the above Stipulation between all parties is hereby
18 approved, the new dates pertaining to the above-referenced action shall be set forth in
19 accordance with the above stipulation between the parties.

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21 DATED: January 20, 2006

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24 _____
25 MORRISON C. ENGLAND, JR.
26 UNITED STATES DISTRICT JUDGE
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